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Attorneys for Defendant-Counterclaimant  
FREESCALE SEMICONDUCTOR, INC.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

MEDIATEK INC.,

Plaintiff,

v.

FREESCALE SEMICONDUCTOR, INC.,

Defendant.

Civil Action No. 4:11-cv-05341 (YGR)

**JOINT STIPULATION TO  
FREESCALE SEMICONDUCTOR,  
INC.'S ADMINISTRATIVE MOTION  
TO FILE DOCUMENTS UNDER  
SEAL**

1 Defendant Freescale Semiconductor, Inc. (Freescale) and Plaintiff MediaTek Inc.  
2 (MediaTek), through their undersigned counsel, hereby agree and stipulate as follows:

3 WHEREAS Freescale wishes to file an Administrative Motion to File Documents Under  
4 Seal in order to file under seal portions of Exhibit D1 to MediaTek's Expert Report of Charles  
5 Narad Regarding Infringement of U.S. Patent No. 6,088,753 (Narad Expert Report), which  
6 Freescale intends to include as an exhibit to its letter in opposition to MediaTek's discovery  
7 submission on source code for certain products (Dkt. No. 141-4);

8 WHEREAS the Exhibit D1 to the Narad Expert Report contains highly confidential  
9 proprietary information derived from confidential circuit diagrams designated by Freescale as  
10 "Highly Confidential – Attorneys' Eyes Only" pursuant to the Stipulated Amended Protective  
11 Order in force in this action;

12 WHEREAS the parties met and conferred on this issue on August 27, 2013;

13 NOW THEREFORE, pursuant to Local Civil Rule 7-11, Freescale and MediaTek, by and  
14 through their respective counsel of record, HEREBY STIPULATE AS FOLLOWS:

15 Exhibit D1 to the Narad Expert Report should be filed under seal.

16 IT IS SO STIPULATED.

17  
18 Dated: August 27, 2013

Respectfully submitted,

19 FREESCALE SEMICONDUCTOR, INC.

20 By its attorneys,

21 /s/ Joshua A. Hartman

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Dated: August 27, 2013

Respectfully submitted,

MEDIATEK INC.

By its attorneys,

/s/ Christopher A. Franklin  
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**ATTESTATION OF E-FILED SIGNATURE**

I, Rudy Y. Kim, am the ECF User whose ID and password are being used to file this Stipulation. In compliance with General Order 45, X.B., I hereby attest that Joshua A. Hartman and Keith L. Slenkovich have concurred in this filing.

Dated: August 27, 2013

/s/ Rudy Y. Kim

Rudy Y. Kim